

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:

ARGON CREDIT, LLC, *et al.*,

Debtor.

Chapter 7

No. 16-39654

(Jointly Administered)

Hon. Deborah L. Thorne

LATONYA D. KITCHEN and KARENSA  
HUTCHENS,

Plaintiffs,

v.

FUND RECOVERY SERVICES, LLC, *et al.*

Defendants.

Adv. Proc. No. 21-00048

Hearing Date: May 18, 2023

Hearing Time: 9:30 a.m.

**NOTICE OF OBJECTION**

**PLEASE TAKE NOTICE** that Fund Recovery Services, LLC (“FRS”) objects to the *Trustee’s Motion to Dismiss Amended Complaint* [ECF No. 92] (“Motion”), which is scheduled for presentment on **May 18, 2023 at 9:30 a.m.** or as soon thereafter as counsel may be heard, before the **Honorable Deborah L. Thorne**, Bankruptcy Judge, or in her absence, before such other Judge who may be sitting in her place and stead and hearing bankruptcy motions.

FUND RECOVERY SERVICES, LLC

By: /s/ Peter J. Roberts

One of its attorneys

Peter J. Roberts (#6239025)  
COZEN O’CONNOR  
123 North Wacker Dr., Suite 1800  
Chicago, Illinois 60606  
(312) 382-3100  
[proberts@cozen.com](mailto:proberts@cozen.com)

**CERTIFICATE OF SERVICE**

Peter J. Roberts certifies that he caused to be served a true copy of the above and foregoing notice upon the attached Electronic Mail Notice List through the ECF System which sent notification of this filing on May 16, 2023.

/s/ Peter J. Roberts

**Mailing Information for Case 21-00048**

**Electronic Mail Notice List**

- **Elizabeth L Janczak** ejanczak@sgrlaw.com, bkdocketing@freeborn.com
- **Peter J Roberts** proberts@cozen.com, peter-roberts-1301@ecf.pacerpro.com;cknez@cozen.com
- **Jeffrey Wilens** jeff@lakeshorelaw.org